

Global Code of Ethics



We protect and beautify the world™

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Message from the Chairman



Our goal is to be the world's leading coatings company by protecting and beautifying our customers' most important assets. We have to listen carefully to our customers' needs and help solve their problems, provide a safe work environment, give back to the community, and act with unwavering integrity in every situation.

I am extremely proud of our long-standing commitment to ethics and compliance. At PPG, we hold ourselves to a very high standard of integrity and professional conduct. Our company's reputation for being an ethical and respectful company with which to do business, wherever we operate, is a crucial competitive advantage.

As we continue to grow and evolve, the ethical conduct of each PPG employee must match our uncompromising standards. New and veteran employees alike play a critical role in PPG's success. It's imperative that each employee knows, understands and fully abides by PPG's staunch commitment to ethics.

This Global Code of Ethics embodies our core values and expectations as an ethical company. Please use it as a tool to help make the right decisions and resolve various ethical issues that you may encounter. If you are ever unsure or feel that the Code or the law is being violated, I ask you to speak up. I strongly encourage you to talk with your manager, your Human Resources representative, the Ethics and Compliance Office or your business or regional legal representative. You may also share concerns anonymously by phone or by using an online web reporting feature through the multilingual [PPG Ethics Helpline](#).

It's our responsibility and commitment to ensure the long-term success of our company – to the benefit of our customers, shareholders, employees, suppliers and neighbors. It takes all of us to achieve that goal by adhering to an unwavering commitment to the high ethical standards at the heart of our global PPG work culture.

Sincerely,

Michael H. McGarry
Chairman and Chief Executive Officer

Our Global Code of Ethics applies to all employees and directors who serve PPG

We seek to do business with suppliers, customers, distributors, resellers, agents, consultants, and other third parties who share our ethical standards and values. PPG employees who work with our business partners are encouraged to:

- Share our Code with these parties.
- Provide these parties with education and information about our standards and values.



Waiver Obligation for Directors and Officers

Any waiver of any provision of the Code for directors or executive officers may be made only by the Board or a Board Committee and must be promptly disclosed to shareholders. Waivers or exceptions to the Code for directors or executive officers will be granted only under unusual circumstances after review by the PPG Board of Directors or a committee of the Board of Directors.



What Employees and Leaders Must Do

Be Knowledgeable

- Read, understand, and comply with this Code and applicable legal requirements.

Be Accountable

- Use good judgment.
- Cooperate fully and with integrity in PPG investigations related to ethics concerns.
- Should you have any questions about this Code or how to respond in a particular situation, see [How to Raise a Concern](#) in this Code.
- If you are approached by anyone inside or outside PPG with a request to do something illegal or unethical, you must refuse to do so.
- Never retaliate against another employee for reporting an ethics or legal concern in good faith. Retaliation will not be tolerated.
- Leaders are expected to raise all violations of the law and violations of this Code, which may result in significant corrective or disciplinary action, to the Ethics and Compliance Office (refer to the [Resources](#) section of this Code).



Be Honorable

- Personally set the example for ethics through actions and words. Stand for what is right and ensure that the truth is known.
- Demonstrate integrity and high ethical standards in all of your business dealings.

Be Respectful

- Create an open environment in which every employee feels comfortable raising concerns.
- Leaders are expected to communicate the importance of ethics and compliance with sincerity and conviction at every appropriate opportunity.

Be Courageous

- Promptly raise concerns about potential violations of the law or this Code.
- Leaders must escalate any employee's expressed concern through the appropriate channels.
- Leaders are expected to take appropriate corrective action when the situation demands it, in consultation with appropriate PPG management.



Employees and leaders who do not fulfill their ethical responsibilities face disciplinary action up to and including the termination of their employment.

Our success depends on your ability to make decisions that are consistent with [Our Values](#). Regardless of the situation, act with total integrity in everything you do.

Consider Your Actions, and Ask for Guidance

If you are ever in doubt about a course of action, ask yourself:

- ✓ Is it legal?
- ✓ Is it consistent with the Code?
- ✓ Does it reflect PPG's values?
- ✓ Will it reflect well on me and PPG?
- ✓ Would it be all right if it appeared in a news headline?

If the answer is “no” to any of these questions, don't do it. If you are uncertain, ask for guidance. Refer to the [How to Raise a Concern](#) section in this Code for information on how to seek help.



It takes all of us!

Our Values

Fundamental to who we are is an unwavering commitment to high ethical standards and integrity. We implement our strategies across all levels of the organization in an uncompromising, ethical manner.

Dedication to the customer

We are in business to serve customers. We focus on our markets and dedicate ourselves to meeting the product and service needs of our customers.

Respect for the dignity, rights and contributions of employees

We operate safe, healthful and harassment-free workplaces that value diversity, promote teamwork and reward performance. We develop our people through continuous learning, creating an environment where opinions are expressed and respected.

Recognition of the concerns and needs of society

PPG recognizes its responsibility to preserve and protect the global environment in which the company operates. To this end, we run our businesses using sound environment, health, safety and product stewardship practices, while providing product solutions that reduce energy consumption and minimize environmental impact. We communicate with the public, participate in governmental processes, and support local communities.

Value of supply chain relationships

We leverage supplier competencies and develop relationships that focus on mutual, continuous improvement and a shared responsibility to meet our customer requirements.

Responsibility to shareholders

We are a performance-focused company committed to the stewardship of the corporation and to delivering returns to PPG's owners.

Raising an Ethics Concern or Violation of the Law

Raising a concern about ethics or legal compliance isn't always easy, but it's the right thing to do and protects our colleagues from harm. You do not need to be certain that a violation has occurred to raise a concern.



Q. I have observed colleagues act in ways that may violate the Code of Ethics. I am not sure if they are really violations. What is the right thing to do?

A. Even if you are in doubt about whether you observed an ethics violation, it is best to report it. Reporting ethics issues may be difficult for many employees. However, addressing these issues is critical to our success and it is the right thing to do. We want to respond to any concerns you have about raising these issues, and we encourage you to help us create the most ethical environment possible at PPG.

Q. I reported a concern about fraud to my supervisor. Since reporting my concern, my supervisor has stopped including me in certain meetings. Is this retaliation?

A. Significant changes in how you are treated after reporting a potential issue may be perceived as retaliation. If you feel you are being treated differently since reporting an allegation, raise your concern by notifying your HR representative or contacting the Ethics and Compliance Office (see the [Resources](#) section of this Code).

How to Raise a Concern

You are expected to promptly raise a concern, in good faith, when you are aware of a situation in which our ethical standards are not being followed.

In particular, all violations of the law and violations of this Code, which may result in significant corrective or disciplinary action, must be reported to the Ethics and Compliance Office. We offer several channels for raising concerns. You can choose to speak to someone about a potential issue or put it in writing. Report the concern to one of the following people:

- Your supervisor or next level of management
- Your human resources leader
- Our Ethics and Compliance Office (refer to the [Resources](#) section of this Code)
 - PPG's Chief Compliance Officer or your regional compliance leader – Our Compliance professionals are trained to take your report in strict confidence and follow up to ensure it is fairly addressed and handled properly.
 - Our [PPG Ethics Helpline](#) – Toll-free, multilingual phone access and an online web report feature is maintained by a third party on behalf of PPG and will take your inquiries and reports in strict confidence.

- Your PPG regional or business unit legal counsel

Note that knowingly and intentionally making a false report of misconduct is unacceptable and might also be illegal.

How We Handle Reported Concerns

We carefully and fairly examine every concern. We will respect your confidentiality, and you may even choose to remain anonymous. However, if you identify yourself, we are able to follow up with you and provide feedback. Your identity and information will only be shared on a need-to-know basis.

Any retaliation – whether direct or indirect – against employees who raise a good faith concern is grounds for discipline up to and including dismissal.



Our Standard

We do not tolerate corruption in connection with any of our business dealings. Do not offer, give, or accept bribes or kickbacks to or from a government official, government entity, or any private party.

Q. What is a kickback?

A. A kickback is a particular form of bribe in which anything of value (money, goods, or services) is given for improper purposes to someone in return for an advantage in a business arrangement, and is usually arranged in advance as part of the business transaction. Some examples are:

- (1) A PPG agent gives a portion of the commission received from PPG back to the employee who retained his/her services.
- (2) In exchange for ensuring a certain vendor is awarded PPG's business, a PPG purchasing employee receives season sports tickets from the vendor for personal use.

Q. An inspector from a local government agency is reviewing our facility for environmental compliance. The inspector requested a separate payment in cash in exchange for certifying that our facility met the requirements. Is it all right to make the cash payment?

A. No, it's not all right. Paying the inspector to obtain the environmental compliance certificate, or any other governmental certificate or license, would be a violation of anti-corruption laws. Remember, you violate the law if you offer or provide anything of value in order to improperly influence a person to secure an advantage for PPG.

[More FAQs](#)

What Everyone Should Know

Although many people only associate bribes with making a payment to an individual to obtain business, unlawful bribes may include providing anything of value to an individual in exchange for a permit, license, certification, customs service, or other business or personal advantage. Anything of value includes cash, gifts, meals, entertainment, business opportunities, PPG product, offers of employment, and more. There is no monetary threshold; any amount could be considered a bribe.

Violations of anti-bribery laws and regulations can result in severe criminal and/or civil penalties for both PPG and the individuals involved.

Your Role

- Understand and adhere strictly to “Our Standard” for bribery and corruption.
- Follow your business compliance procedures and require that any third party representing PPG be carefully selected and comply with our Anti-Corruption Policy and applicable laws.
- For additional information, refer to our [Global Anti-Corruption Policy](#).
- Consult your regional or business unit legal counsel about the anti-corruption laws that may apply to your job.
- See [How to Raise a Concern](#) in this Code if you have a question or concern.

Never make improper payments to further PPG's business interests.

Our Standard

A conflict of interest exists any time your personal interests influence or appear to influence your duty to act in PPG's best interest. Avoid any situation that creates a real or perceived conflict of interest.

Having a conflict of interest is not necessarily a violation of PPG policy, but failing to promptly disclose a conflict is always a violation. Even when nothing wrong is intended, the appearance of a conflict of interest may have negative effects.

Q. I work with a contract employee who is a family relative of my PPG supervisor. My supervisor approves the contractor's invoices and time sheets. Is this a Conflict of Interest?

A. This situation presents a Conflict of Interest that the supervisor must disclose to PPG management. It may be the case, or at least there may be a perception, that the contractor receives favorable treatment or is unfairly compensated. You should raise the concern to your supervisor's manager, your HR representative, or the Ethics and Compliance Office (see the [Resources](#) section of this Code).

Q. My brother owns a company that has submitted a bid to PPG for an IT project. I won't be involved in deciding which supplier is selected for this project. Do I have to disclose this?

A. Yes, this is a potential conflict of interest that should be disclosed. Successful supplier relationships are core to our business and we demonstrate this by being transparent when selecting suppliers. Even though you are not in a position to select your brother's company as the supplier, if you do not disclose this, it may create the appearance of a lack of honesty and transparency about a situation in which you may have a personal interest and which may conflict with PPG's best interests. This conflict of interest can likely be easily managed, but it is still appropriate to disclose it.

What Everyone Should Know

Conflicts of interest may not only harm our mutual interest in PPG's financial success, but may also harm PPG's reputation or your own reputation.

Using PPG resources for personal benefit is a type of conflict of interest that is prohibited. Other examples of potential conflicts of interest may include:

- When you or someone close to you personally profits from a business transaction involving PPG
- Sharing PPG non-public information to benefit someone outside of PPG
- Providing services to any business or organization that competes with PPG
- Having a family member or close personal relation who works for a direct competitor
- Having a personal relationship in the workplace that may compromise PPG's best interest
- Participating in secondary employment that affects your job performance
- Conducting personal activities during work hours that affects your job performance

Your Role

- Be able to recognize a potential conflict of interest.
- Disclose any potential conflicts of interest to your supervisor and other appropriate PPG resources. In some cases, disclosure may be all that is necessary. Your supervisor along with others as needed will determine if any actions will be necessary to manage the conflict.
- See [How to Raise a Concern](#) in this Code if you have a question or concern.

Always make business decisions based on what is best for PPG, never what is best for you personally.

Gifts, Entertainment, Meals, and Trips

Our Standard

We may not offer, give, accept, or solicit gifts, entertainment, meals, trips, or any other benefit that:

- Does not have a legitimate business purpose, such as creating goodwill for PPG
- Could reasonably be interpreted as an attempt to improperly influence the recipient
- Violates the law or policy of the other party's employer
- Is inappropriate, either in type, value, or frequency, considering the other person's business position
- Carries an expectation of a reciprocal benefit (quid pro quo)

Q. My customer requested US \$100 in cash to purchase flower baskets for a new store-opening ceremony. If the customer provides me with a receipt for the flower baskets, is it all right to give the cash donation?

A. Cash payments to customers are not permitted for any purpose. You should purchase the flower baskets from the flower shop directly rather than purchasing through the customer, after obtaining pre-approval from your authorized approver. Obtain a written invitation of the new store opening and any other information to support your gift pre-approval request.

Q. I would like to give gifts to two employees of a customer to thank them for their help during the bidding of several projects. Is this permitted?

A. Employees cannot give a gift that could reasonably be interpreted as an attempt to improperly influence the recipient. If we are in the process of bidding for a project, giving a gift could be improper or create the wrong perception and should not be given.

[More FAQs](#)

What Everyone Should Know

- If you are offered a gift or invitation that does not meet “Our Standard”, you should tactfully decline the gift or invitation. If declining a gift is culturally unacceptable or could damage a business relationship, you may accept the gift and then turn it over to PPG’s internal auditors for donation to a charitable organization. You also may pay a gift’s fair market value to PPG and the money will be donated to charity.
- The [Controller's Manual](#) and other regional policies may require pre-approval before giving a gift. Consult with your supervisor before giving a gift, entertainment, or anything else of value.
- Gifts, entertainment, and anything else of value should be legal, appropriate for the recipient’s position, and accurately recorded in PPG’s books and records. Please refer to your local policies and procedures.

Your Role

- Take care not to give or accept cash or a cash equivalent. Cash equivalents are things that can be readily converted to cash, including cash advances, gift cards, vouchers, securities, and loans.
- Do not provide gifts, entertainment or anything else of value to government officials or government employees unless you’ve received the required prior approval according to regional policies. In the U.S., refer to PPG’s policy on [Providing Gifts, Meals, and Entertainment to U.S. Public Sector \(Government\) Employees](#).
- Never propose or engage in any form of entertainment that exploits, embarrasses, or degrades anyone, or may otherwise be inappropriate or reflect negatively on our image.
- See [How to Raise a Concern](#) in this Code if you have a question or concern.

Avoid even the appearance of giving or accepting anything of value that may improperly influence the recipient.

Our Standard

We are committed to fair and open competition in global markets. We must compete vigorously, aggressively, and fairly, and without any anti-competitive understandings or agreements with our competitors.

Everyone who works for or represents PPG must comply with all applicable competition laws and regulations, including the antitrust laws of the United States and the competition laws in every country in which PPG conducts business.

What Everyone Should Know

Collecting and using information about competitor strategies and market conditions is allowed and even desirable, provided it is obtained through legitimate means. Sharing commercially sensitive information with competitors is not allowed. Do not use a customer, supplier, or other third party as a conduit to enable communication with our competitors.

Although certain discussions with competitors, such as those during trade or professional association activities, may serve a legitimate and useful business purpose, you must not use these or similar activities for communications with competitors which violate the law or PPG policy.

Be aware that contact with competitors may create the perception of improper agreements or understandings.

Your Role

- Never collude with other companies on prices or terms to be offered to customers, agree with competitors to allocate markets or customers, or manipulate the bidding process.
- Do not enter into discussions, formal agreements, or informal understandings with our competitors concerning the manufacture, sale or distribution of products or services. This includes issues such as prices, wages, costs, profits, terms of sales, credit arrangements, market share, production volume, sales territories, products, and services to be offered, bidding strategy, customer allocation, and methods of distribution, or boycott of third parties. Be sure to work with your regional or business unit legal counsel to review certain arrangements with customers and suppliers, such as exclusive supply/purchase agreements, territory and customer group arrangements.
- Do not propose or enter into any agreement with any other party regarding whether or how to bid. Only submit bids if the purpose is to compete for and win business.
- Actively disassociate yourself from any situations in which improper agreements or information sharing between competitors are discussed and promptly inform your PPG regional or business unit legal counsel. This includes situations that may occur when participating in trade or professional associations. See our [Trade and Professional Association Guidance](#) for more information.
- For more information, see our [Antitrust/Competition Law website](#) or consult your PPG regional or business unit legal counsel for guidance.
- If you have any questions or concerns about communications with our competitors, see [How to Raise a Concern](#) in this Code.

Do not enter into any agreement with competitors that deprives customers of the benefits of competition.

Our Standard

We require our employees to understand and abide by all applicable trade compliance laws, regulations, PPG policies and procedures in all countries where we do business. This includes regulation of import, export, re-export, and deemed export activities.

- Q.** My customer doesn't want to pay duty on an imported product and asked me to list the value of my shipment at \$0. Should I modify the documents?
- A.** No. All exported and imported goods are required to have a fair market value which is known as the customs value.

- Q.** I am being asked to release an order for export even though the customer has not yet provided the end-use information the business requested. Is this allowed?
- A.** No. When end-use information is required, it must be obtained prior to exporting the goods.

[More FAQs](#)

What Everyone Should Know

As an importer, we must correctly classify and value merchandise and provide other information enabling customs authorities to fulfill their responsibilities.

As an exporter, we must follow requirements restricting the transfer of items and information to certain foreign countries or persons for national security and foreign policy reasons. In some cases, the export may not be permitted at all – such as exports to embargoed and sanctioned countries or persons. In others, the export may require prior authorization from the U.S. or local government.

Certain laws also prohibit support of boycott activities. Even if a particular country does not have such a law, PPG's policy prohibits support of boycott activities.

Penalties for violating export controls, both civil and criminal, may be imposed against the company and employees, and can be severe.

Your Role

- All employees involved in import and export transactions must make every effort to understand and comply with relevant business procedures, legal requirements, and PPG policies to prevent any unauthorized or prohibited export from occurring.
- Contact your local Import Services team or your Export Control Coordinator to address any questions you may have. See the ECC Contact List at the [Global / U.S. Export Compliance website](#).

Always know what you are exporting, its destination, the end user, and the end use. Provide Customs organizations with complete and accurate export and import information.

Our Standard

Money laundering is the process of concealing illicit funds or making these funds look legitimate. Money laundering is strictly prohibited. We are committed to complying with applicable anti-money laundering, anti-corruption, and anti-terrorist financing laws and regulations.

We conduct business only with customers involved in legitimate business activities, with funds derived from legitimate sources.

Q. What are some signs of potential money laundering?

A. Signs that may be indications of money laundering activity include:

- Attempts by a customer to provide false or anonymous information to open an account, or refusal to provide requested information.
- Payments made or requested in currencies other than those specified in the contract, or requests to pay more than provided for in the contract.
- Orders, purchases, or payments that are unusual or inconsistent with a customer's trade or business.
- Payments on behalf of a customer from an unknown or anonymous person or from an unusual non-business account.
- Transactions structured to evade reporting requirements in any jurisdiction.
- An unusual pattern of transactions, such as bulk purchases of products or gift cards, or repetitive cash payments.

What Everyone Should Know

Local country laws may require reporting of certain transactions to authorities, such as cash sales.

Your Role

- Understand who PPG does business with and the legitimacy of their business practices and activities.
- Be alert for any signs of potential money laundering, terrorist financing, or other illegal activities. See [How to Raise a Concern](#) in this Code to escalate any suspicions.



Always know whom you are doing business with and report any suspicious or illegal activity.

Sustainability – Safety, Environment, and Community

Our Standard

We are committed to delivering lasting value by engaging all employees and their families in promoting safety, encouraging wellness, protecting the environment, and supporting the communities where we operate.

What Everyone Should Know

PPG has an Environment, Health, and Safety Management System that is used globally to comply with regulations, improve safety and health, and reduce our environmental footprint.

Read PPG's Sustainability Report available at:
sustainability.ppg.com/Home.aspx.

Your Role

- Understand and adhere to your responsibilities in meeting environment, health, and safety objectives.
- Come to work rested, alert, and unimpaired by alcohol or drugs to carry out your job responsibilities safely.
- Notify your supervisor, or HR or EHS representative of any workplace violence acts or threats, intimidating, or coercive behavior against an employee or business partner, or threats to the security of our operations.
- Speak up when you see something that could cause harm to yourself, a co-worker, or the environment, and encourage others to do the same.
- Employees are encouraged to continuously learn how to improve safety at work and at home.



Safety starts with me – today and every day.

Charitable Contributions



Our Standard

PPG and the PPG Foundation bring color and brightness to PPG communities around the world through providing financial support to eligible charitable organizations across three priority areas: education, community sustainability, and employee engagement. In certain instances, however, charitable donations may present a risk of violating ethical principles and anti-bribery laws and regulations. We are committed to providing support only to qualified organizations for proper purposes and with strict adherence to our ethical and legal obligations.

- Q.** A potential customer is an officer of a charity and asks me to make a donation. Can I make the donation and then claim the expense for reimbursement on my expense report?
- A.** No. Since it could be perceived that the charitable donation was made to influence the potential customer to buy PPG's product, you should not make this contribution.

[More FAQs](#)

What Everyone Should Know

Risks in making charitable donations arise if contributions are made to a charity for improper purposes or at the direct request, suggestion, or recommendation of a government official or commercial partner. Making a contribution in these cases could be considered an indirect bribe made in order to obtain or retain contracts, business, government approvals (e.g., permits, licenses, favorable tax or customs decisions), or to secure any other improper business advantage.

Your Role

- Consult the [Global Charitable Contributions](#) section on the [Global Ethics and Compliance](#) website for guidance in advance of making any charitable donation on behalf of PPG.
- If you have a question or concern about a planned charitable donation, see [How to Raise a Concern](#) in this Code.
- Employees participating in community-engagement activities should follow all PPG program guidelines provided at the Employee Portal section at [ppgcommunities.com](#).
- Direct eligible organizations to the “Apply for Support” section on [ppgcommunities.com](#).

Support qualified organizations that align with our ethical and legal obligations.

Working with Governments

Our Standard

We follow the highest ethical standards in conducting business with governments, and are always truthful and accurate. We commit to complying with all applicable laws and regulations when engaging with governments, their employees, and their officials.

- Q.** Who are considered “Government Employees and Officials”?
- A.** A “Government Employee” or “Government Official” includes the following – whether federal, national, state/provincial, or local from any country:
- Military personnel and civilians employed by a branch of the military
 - Employees of public or government agencies, departments, ministries, or offices
 - Employees of state-owned and state-controlled enterprises or institutions, which may include hospitals, oil companies, public utilities, railroads, airlines, public universities, and central banks
 - Candidates for political office and employees of political parties
 - Employees of public international organizations (e.g., United Nations, Red Cross, World Bank)
 - Those acting in an official capacity on a government’s behalf

Any questions should be directed to your PPG regional or business unit legal counsel.

- Q.** A chemical weapons inspector has arrived at our manufacturing plant. May I present a case of paint to the inspector as a sign of goodwill?
- A.** No. Never give anything of value to a government official without the pre-approval of regional legal counsel and Government Affairs. Giving the product, or anything else of value, to the inspector under these circumstances could be perceived as a bribe to influence the inspector’s review of the facility. In addition, depending on the country, it may be against the law to give the product – or anything else of value – to the inspector.

More FAQs

What Everyone Should Know

This Code, as well as laws and regulations applicable to PPG, prohibits making or offering bribes, payments or anything of value to a government employee or government official to obtain or retain business or to gain any other improper business advantage. Making campaign contributions to state or local officials in some jurisdictions where PPG may have sought or is seeking government contracts may also be prohibited.

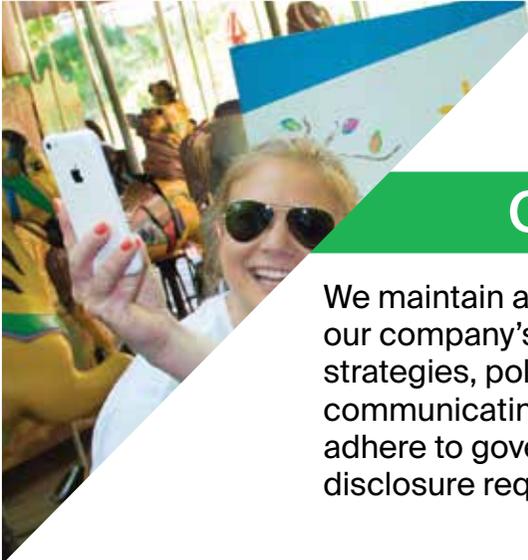
In some countries, making political contributions may not be permitted at all. Always consult your regional legal counsel before making any political contributions.

Your job status will not be affected by your personal political views or by your choice in making personal political contributions.

Your Role

- Consult your PPG regional or business unit legal counsel before pursuing government business opportunities.
- Don’t offer or give anything of value to a government employee that is inconsistent with PPG’s policy or local laws and regulations. Refer to the [Bribery and Corruption](#) section of the Code for further information.
- Don’t contribute company assets, including your time at work, use of PPG premises or equipment, or corporate funds to a political candidate or political action committee without first getting the authorization from the senior-most manager in your region and notifying PPG’s Managing Director of Government Affairs.
- Notify Government Affairs of planned contributions that bear any connection to PPG to ensure the contribution does not violate any U.S. or local law.
- If you plan to seek or accept a public office, you must obtain prior approval from PPG regional or business unit legal counsel in accordance with applicable laws.
- See [How to Raise a Concern](#) in this Code if you have any questions or concerns.

Never make improper payments to government officials or government employees.



Our Standard

We maintain a consistent message reflecting our company's ethics and current corporate strategies, policies, and interests when it comes to communicating with and through the media, and we adhere to government, stock exchange, and other disclosure requirements.



Communicating with External Parties

What Everyone Should Know

PPG does not, and our employees do not, formally endorse or recommend any product, service, or company, whether for-profit or not-for-profit, without business justification.

To maintain clarity when communicating PPG's financial results, we do not make any announcements about anything that could cause a normal investor to change their position on the company's stock during the week in which PPG announces quarterly earnings.

PPG work-related matters that you post on a social media site may be republished to others without your knowledge. When you post anything, you should assume that it will become public. Don't post things that would embarrass or harm you, PPG, or others if they became public.

Your Role

- Always consult with corporate or business unit communications representatives before responding to external media on behalf of PPG.
- Observe PPG's policies on personal use of social media when using a PPG device and business use of social media. Refer to [PPG's External Communication Policy](#) and [Social Media Policy](#) for further information.

Involve PPG's communications professionals prior to engaging in any communication with or through the media.

Human Rights, Diversity, and Inclusion

Our Standard

The relationship between PPG and its employees is based on mutual respect, reciprocal trust, and shared objectives. Every PPG leader has the responsibility to strengthen our common bonds and enhance their impact on our day-to-day activities.

We are committed to valuing differences among us in experience, perspective, background, race, age, national origin, religion, sex, sexual orientation, gender identity and/or expression, culture, interests, geography, and style, and we strive for a collaborative environment in which everyone has a chance to succeed.

We respect the dignity and human rights of all people, and we comply with all laws pertaining to freedom of association, privacy, collective bargaining, immigration, working time, wages, and hours, as well as laws prohibiting forced, compulsory and child labor, human trafficking, and employment discrimination.

We base employment decisions on job qualifications and merit, which include education, experience, skills, ability, and performance.

We give equal employment opportunity to – and will not discriminate against – individuals on the basis of any status protected by applicable laws.

Your Role

- Build a trusting and collaborative environment, speak up and contribute, challenge the status quo, and seek to work with people from different backgrounds.
- Engage with your supervisor to understand performance, feedback, and learning expectations.
- Actively eliminate bias, mistreatment, and discrimination.
- Managers and supervisors are expected to build engaged organizations that involve all groups; encourage, appreciate and consider feedback from all levels of the organization; and reward work and behaviors that drive results, consistent with [Our Values](#).
- Consult your regional Human Resources web page for information on local HR policies.
- See [How to Raise a Concern](#) in this Code if you encounter a conflict between PPG's practices and local laws or HR policies.

Q. What is diversity and inclusion?

A. Diversity refers to a mix of people of different demographics, cultures, backgrounds, experiences, and perspectives in a group or organization. Inclusion refers to a business environment that integrates a diverse employee population into one collaborative work place. Research has shown that a diverse and inclusive environment drives innovation, better financial performance, and retention of talented employees.

Q. I think I was passed up for a promotion due to my race. What should I do?

A. If you feel you have been discriminated against due to race or any other legally protected characteristic, you should raise your concern by notifying your HR representative or by contacting the Ethics and Compliance Office (see [Resources](#) section of this Code).

We do our best work when we engage with each other and draw on unique and individual perspectives to reach shared goals.

Harassment and Bullying

Our Standard

We are committed to providing a workplace that is free from harassment and bullying.

- Q.** My co-worker circulated an email that was offensive to me. What should I do?
- A.** Ask the co-worker to stop sending these types of emails. If you are not comfortable speaking directly with the co-worker, or the co-worker does not stop sending these types of emails, you should contact your immediate supervisor, HR representative, or the Ethics and Compliance Office (see the [Resources](#) section of this Code).
- Q.** My supervisor routinely shouts at me and my colleagues in front of others using an angry tone and demeaning language. Is this bullying?
- A.** Your supervisor's conduct constitutes bullying if it negatively impacts your ability to perform your job and causes you embarrassment or humiliation. If that is the case, then you should report this conduct to senior management, your HR representative, or to the Ethics and Compliance Office.

What Everyone Should Know

Harassment is unwanted and offensive verbal, nonverbal, or physical conduct that creates an environment of hostility or intimidation for a person because of sex, sexual orientation, gender identity and/or expression, race, age, national origin, religion, or other status protected by law.

Bullying is repeated verbal or physical abusive or malicious conduct that undermines or interferes with another's work performance or which a reasonable person would find offensive, threatening, intimidating, or humiliating.

These terms may have specific meanings under local law. Consult with your local HR representative or PPG regional or business unit legal counsel if you have questions.

Your Role

- Understand what workplace harassment and bullying is, and how to handle and report it.
- Take personal responsibility to create a work environment that fosters mutual respect and working relationships free of harassment and bullying.
- Do not use PPG's electronic or information systems in any way that may be disruptive or offensive to others.
- See [How to Raise a Concern](#) in this Code if you have a question or concern.

Treat all employees with courtesy, dignity, and respect.



Our Standard

We respect individual privacy rights and are committed to collecting, handling, reviewing, and protecting personal information responsibly and in compliance with applicable privacy and information security requirements and laws in the U.S. and in all countries in which we operate.

We strive to respect the privacy of our employees by honoring our legal requirements and upholding high ethical standards.

- Q.** What is “personal information”?
- A.** Personal information is any information that can be used to identify, contact, or locate an individual. It is usually confidential, and protected from risk of disclosure to unauthorized persons and from accidental or unlawful destruction, loss, alteration, or access at all times.

- Q.** What are legitimate business reasons to access and disclose the content of messages sent on equipment or systems provided by PPG?
- A.** Legitimate business reasons include investigating actual, suspected or alleged violations of this Code or PPG policies; assessing compliance with relevant laws and regulations including those mentioned in this Code; and where monitoring of communications is otherwise necessary and proportionate in order to protect PPG, its employees, customers, suppliers, and business partners.

[More FAQs](#)

What Everyone Should Know

We will provide personal information to others only on a need-to-know basis for legitimate business purposes and in accordance with applicable laws.

All messages and communications transmitted and made using electronic systems and devices provided by PPG to its employees are company records.

As such, our local PPG companies in each country may access, monitor, and review the content of all such messages, communications, and records where there is a legitimate business reason to do so and where this is permitted under local data privacy and employment laws.

Your Role

- If you have access to personal information as part of your work, it is important that you manage such data in accordance with PPG policies as well as U.S. and local laws and requirements.
- Limit access to PPG personal information to authorized individuals who need it for legitimate business purposes.
- Be aware of, and comply with, all PPG Information Technology security policies and with PPG’s [Confidential Data Handling Policy](#).

Respect and balance individual privacy rights with the law and PPG policies.

Protecting Company Assets

Our Standard

Our commitment to stewardship of the corporation is a key responsibility to our shareholders. As employees, we are responsible for protecting company assets and using them solely for company business purposes.

Q. While traveling on business, I paid cash for a meal and lost my receipt. Is it okay to submit a different receipt that is for approximately the same amount when I claim the meal expense?

A. No, you should not use a different receipt to support the meal expense, even if the expense amounts are the same or approximately the same. All receipts submitted with expense reports must reflect the actual transaction that is described on the expense report.

You should insert a comment in your expense report explaining that you have lost the receipt and provide other appropriate details. Frequent loss of receipts may lead to non-approval of the specific expense.

Q. Can I take off-specification paint or unused equipment for my own purposes?

A. No, you cannot do so without first getting permission from your supervisor. It is every employee's responsibility to ensure PPG assets are used to benefit the company.

[More FAQs](#)

What Everyone Should Know

Company assets are things that are both tangible and intangible. Tangible assets include money, property, facilities, products, equipment, and communication systems. Intangible assets include work product, intellectual property, information systems data, and non-public information.

We observe privacy laws that apply in each country where PPG operates. However, we reserve the right to monitor, control, and disclose PPG information on PPG assets, or on personally-owned devices that access our networks, as needed, to protect the Company's interests in accordance with applicable laws.

Fraud, theft, embezzlement, or diversion of PPG assets is illegal as well as unethical.

We have established internal control standards and practices to safeguard Company assets from theft, loss, and misuse, and to accurately account for them.

Your Role

- Use PPG assets for PPG business. Do not use them for your personal benefit or the benefit of anyone other than PPG.
- Do not use PPG assets to access, reproduce, display, distribute, or store any materials that are illegal, sexually explicit, obscene, or otherwise inappropriate.
- Comply with your regional Travel and Expense Policy. Use PPG funds appropriately, and submit accurate expense reports with all relevant details and valid receipts.
- See the [Confidential and Non-public Information](#) and [Intellectual Property](#) sections of this Code for more information on protecting these critical company assets.

Protect PPG's assets and use those assets in the manner intended.

Confidential and Non-public Information



Our Standard

We recognize the value that PPG confidential and non-public information brings to our company and shareholders. As employees, we are responsible for protecting and controlling confidential and non-public information (NPI) from unauthorized disclosure or use both inside and outside of PPG.

Intellectual property (IP) is a special type of NPI that is protected by specific laws. See the [Intellectual Property](#) section of this Code for more information.

Q. I want to work from home on a PPG project. What is the best way for me to do that and have access to PPG data?

A. When working from home or any remote location, the best way to access PPG data is to use a PPG laptop or use [remote access](#) to log into PPG from your home or other non-PPG personal computer.

Do not copy the data to a USB device (a removable storage device such as a flash drive) to use on a non-PPG personal computer.

Do not send the data using PPG email to your personal email.

Q. I received an urgent email at work from what appears to be a PPG executive asking me to rush a transaction and send data. This might be a valid request but I'm not sure. What should I do?

A. It would be unusual for a PPG executive to ask an employee via email to send data urgently or rush a transaction. You should review the request with your supervisor or someone in the organization who can validate the request; or call the sender of the request to confirm it is valid before taking the requested actions.

[More FAQs](#)

What Everyone Should Know

Examples of non-public information include information related to:

- Employees
- Inventions
- Contracts
- Strategic and business plans
- New product launches
- Mergers and acquisitions
- Formulas and specifications
- Pricing, product costs, financial data

All PPG business communications must be conducted using company-provided resources or company-approved communication resources.

Your Role

- Limit access to PPG information to authorized individuals who need it for legitimate business purposes, even inside PPG.
- Retain or discard information in accordance with our record management policies.
- Be alert to circumstances in which you conduct business. Protect our information by avoiding discussions in public, and protecting paper and electronic documents from public view and access.
- Work with your regional or business unit legal counsel to ensure the proper use of confidentiality agreements prior to sharing PPG information with third parties.
- Be careful to comply with all PPG Information Technology security policies.

If your job includes access to any PPG confidential and non-public information, it is your responsibility to protect it from unauthorized disclosure.

Our Standard

As employees, we are responsible for protecting, controlling, and using company-owned intellectual property (IP) in the best interests of the company. We take precautions to avoid unauthorized disclosure of confidential IP both inside and outside of PPG.

We respect the IP rights of others and will not condone asking or instructing an employee to gain access to the confidential IP of others. We won't accept, disclose, or use a third party's IP unless an appropriate agreement is in place.

- Q.** A PPG employee who has knowledge of intellectual property pertaining to PPG products shared non-public information with a friend who works for another company. I know that the information is confidential and should not have been shared. What should I do?
- A.** It is not appropriate, and contrary to PPG policy, to share PPG's intellectual property or any other non-public information with anyone outside of PPG. As a PPG employee, you have a duty to immediately report your concern. See [How to Raise a Concern](#) in this Code.

- Q.** An employee who recently joined PPG from a competitor told you he has knowledge of a new research initiative being undertaken by the competitor. What should you do?
- A.** PPG does not accept the confidential information of third parties, including prior employers. Ask your supervisor, regional legal counsel, or IP legal counsel to talk to the new employee about this.

What Everyone Should Know

Intellectual Property (IP) generally includes knowledge, creative ideas and other intangible assets such as patents, trade secrets, know-how, trademarks, and brand names that have commercial value and are protectable under the law from imitation, infringement, and dilution.

Your Role

- Label, store, control, and share all IP in accordance with your business or function guidance. Ensure that access to confidential IP is granted only to individuals with a legitimate need and for the benefit of PPG.
- Do not access, keep, share, or use a third party's confidential or non-public information, especially from a previous employer, unless there is an arrangement in place allowing you to do so.
- Do not provide PPG's confidential or non-public information to a third party without first getting the proper internal approval and the appropriate confidentiality agreement with the third party.
- Do not use PPG resources to reproduce, display, distribute, or store any materials that violate trademark, copyright, licensing, or other intellectual property rights of any party.
- Exercise caution to protect PPG's confidential and non-public information when with visitors or when working externally.
- See [How to Raise a Concern](#) in this Code if you have any questions or concerns.

Intellectual property is a critical company asset that is protected by law.

Insider Trading – Buying and Selling Stock

Our Standard

Avoid buying or selling stock if you are aware of information that has not been shared publicly and could have an effect on the value of the stock. This applies to PPG stock and to third party stock, including the stock of a supplier, customer, or business partner of PPG.

Using material non-public information for your financial or other personal benefit, or sharing it with others, violates PPG's insider trading policy and may violate the law. We must all commit to adhering to our ethical and legal obligations when we have access to any PPG non-public information.

Q. What is “material non-public information”?

A. Non-public Information is information you may learn in your job about PPG or other companies that has not been made public. Non-public Information is “material” if a reasonable investor would consider it important in deciding to buy, hold, or sell securities, or if publication would likely affect a company's stock price.

Types of information that may be material non-public information include:

- Financial forecasts
- Earnings information
- Changes in dividends
- Proposed or pending acquisitions/divestitures
- Changes to stock repurchase plans
- New equity or debt offerings
- Strategic plans
- Regulatory actions
- Changes in senior management
- Product launches or recalls

Determining if non-public information is material is not always straightforward and depends on facts and circumstances. Consult your PPG regional or business-unit attorney for guidance.

[More FAQs](#)

What Everyone Should Know

Determining what constitutes material non-public information is a matter of judgment. In general, information is material if it would likely be considered important by an investor buying or selling the particular stock.

Your Role

- Don't use or share material non-public information for financial or any other personal benefit.
- Never buy or sell the securities (such as stock, bonds, or options) of PPG or any other company, either directly or through family members, other persons, or entities while you are aware of material non-public information.
- Don't recommend that anyone buy or sell the securities of any company – including PPG – while you have material non-public information about that company.
- Only share material non-public information when necessary for PPG's business activities and with proper controls in place (such as a non-disclosure agreement with a supplier).
- Avoid trading PPG securities if you are aware of a significant announcement, such as quarterly earnings.
- Do not serve as an independent consultant or expert outside of PPG on business matters within the scope of your PPG employment.
- Report immediately if you have knowledge that any material non-public information has been disclosed inappropriately.

PPG employees are prohibited from using or disclosing material non-public information for their personal benefit.

Business and Financial Records

Our Standard

Timely and accurate creation of all PPG commercial and financial information and records is at the core of our commitment to do business ethically and with integrity. It reflects on PPG's reputation and credibility, and ensures that PPG meets its legal and regulatory obligations. We commit to creating only PPG business and financial records that fully and accurately reflect PPG's business activities, consistent with generally accepted accounting principles, standards, PPG policies, and regulations for accounting and financial reporting.

- Q.** Two separate ACTs (Authorization for Capital Transactions) were approved to expand two manufacturing plants. Both expansions were managed by the same manager. After all invoices were charged to each ACT, one project was completed for less than its authorized capital but the other project exceeded its authorized capital. In total, actual spending for the two projects was less than the total authorized spending, so the manager moved some charges from the over-budget ACT to the under-budget ACT. Was it all right to do this?
- A.** No. All financial transactions must be accurately recorded to represent the actual business transaction. Under-charging one project and over-charging the other means that the cost of one plant expansion is understated in PPG's financial records, while the cost of the other plant expansion is over-stated.

What Everyone Should Know

Ensuring accurate and complete business and financial records is every employee's responsibility.

All financial transactions (e.g. funds, payments, expense reports, expenditures) and other transactions (e.g. product tests, employee performance) must be accurately recorded and supported by documentation that clearly and accurately states their purpose.

PPG is legally required to maintain proper internal accounting controls and accurate financial and other business records.

Your Role

- Develop and maintain efficient and effective processes with appropriate internal controls that properly reflect transactions or events, as well as prevent or detect inappropriate transactions.
- Develop and maintain business and financial records that are complete, accurate, and timely. Follow PPG policies and procedures in deciding when to retain and dispose of them.
- Comply with our travel and expense reporting policies as well as all other established accounting policies.
- Raise a concern if you become aware of actions, transactions, accounting, or reporting that are questionable or otherwise inconsistent with PPG's values and the protection of PPG's reputation, such as financial results that seem inconsistent with underlying performance; circumvention of review and approval procedures; and incomplete or misleading communications about the substance or reporting of a transaction.

We must be honest, complete, and accurate in our records, accounting, communications, and decision making.

Ethics and Compliance Office

The Ethics and Compliance Office is available to answer any questions about the Code and PPG's policies, or to discuss any concerns you may have about potential Code violations.

To contact the Ethics and Compliance Office:

- **PPG Helpline** – To make a confidential and anonymous report in your language, use the [Ethics Helpline](#) to locate the phone number for your country or to make an online report.
Call [+1.720.514.4400](#) if your country is not in the Ethics Helpline list.
Call [+1.800.461.9330](#) in the U.S. and Canada (English).
- Email chiefcomplianceofficer@ppg.com
- Email [Ask the Experts](#)
- Fax to [+1.412.434.4292](#) in the United States
- Mail to: PPG Chief Compliance Officer
PPG
One PPG Place
Pittsburgh, PA 15272 USA

Full Web Addresses for Links in this Code

Antitrust / Competition Law website

<https://one.web.ppg.com/na/corplaw/en/antitrust/Pages/Antitrust%20and%20Competition%20Law.aspx>

Ask the Experts

dl-ethicsquestions@ppg.com

Confidential Data Handling Policy

<https://one.web.ppg.com/global/it/portal/ITSecurity/Policies/Policy%20-%20Confidential%20Data%20Handling.pdf> (see Data Privacy section)

Controller's Manual

<https://one.web.ppg.com/na/globalfinance/policies/Pages/Controllers-Manual.aspx>

Global Anti-corruption Policy

<https://one.web.ppg.com/na/corplaw/en/Pages/AntiCorruption%20and%20FCPA.aspx>

Global Charitable Contributions

<https://one.web.ppg.com/na/corplaw/en/Pages/Charitable-Contributions.aspx>

Global Ethics and Compliance website

<https://one.web.ppg.com/na/ethics/en/Pages/default.aspx>

More FAQs – Global Code of Ethics Supplement

corporate.ppg.com/faq-en (available externally)

Global / U.S. Export Compliance website

<https://one.web.ppg.com/global/gsm/purch/coll/expcomp/SitePages/Home.aspx>

Our Values

vision.ppg.com (available externally)

PPG Community Engagement

ppgcommunities.com (available externally)

PPG Ethics Helpline

ppgethics.com (available externally)

PPG's External Communications Policy

<https://one.web.ppg.com/global/cga/tools/Pages/default.aspx>

PPG's Sustainability Report

sustainability.ppg.com/Home.aspx (available externally)

Providing Gifts, Meals, and Entertainment to U.S. Public Sector (Government) Employees

https://one.web.ppg.com/na/ethics/en/Documents/PPG_Gift_Meal_Entertainment_Policy%20US%20Govt%20Employees%201312019.pdf (see Gifts, Entertainment, Meals section)

Remote Access

ra.ppg.com

Social Media Policy

<https://one.web.ppg.com/global/it/portal/ITSecurity/Guidelines/Guidance%20to%20PPG%20Employees%20on%20Personal%20Use%20of%20Social%20Media.pdf> (see Communicating with External Parties section)

Trade and Professional Association Guidance

<https://one.web.ppg.com/na/ethics/en/policies/Pages/Trade%20and%20Professional%20Associations%20Guidance.aspx>



PPG's Ethics Helpline is provided by Convercent

Fully operational 24 hours a day, 7 days a week, 365 days a year, our Ethics Helpline offers every employee a secure, easy, and non-threatening way to report issues or concerns. Use ppgethics.com (available externally) to file an online report or to locate a country number to speak to an operator in your native language. A partial selection of available phone numbers is provided below.

For countries not available at ppgethics.com, use +1.720.514.4400 for a collect call or to reverse charges. Operator assistance may be required and local charges may apply.

When calling the Helpline, be sure to state that you are calling to discuss a matter involving PPG.

COUNTRY	TOLL-FREE NUMBER
Argentina	0800.333.0095
Armenia	+374.60462654
Australia	1.800.763.983
Belgium (Dutch, French)	0800.260.39
Brazil	0021.800.1777.9999
Brazil (Rio de Janeiro)	+55.212018111
Canada (English)	1.800.461.9330
Canada (French)	1.800.235.6302
Chile	1230.020.3559
China	00.400.120.3062
Colombia	5713816523
Costa Rica	+506.4000.3876
Czech Republic	800.701.383
Denmark	00.800.1777.9999
Egypt	0800.000.0413
Finland	0800.07.635
France (includes Andorra, Corsica, Monaco)	00.800.1777.9999
Georgia	+995.706.777493
Germany	00.800.1777.9999
Greece	00800.1809.202.5606
Guatemala	+502.23784832
Hong Kong	001.800.1777.9999
Hungary	00.800.1777.9999
India	000.800.100.4175
Indonesia	001.803.015.203.5129

COUNTRY	TOLL-FREE NUMBER
Indonesia (Jakarta)	+62.21.297.589.86
Ireland (English)	00.800.1777.9999
Israel	00.800.1777.9999
Italy	00.800.1777.9999
Japan	0800.170.5621
Korea, Republic of (South Korea)	080.808.0574
Luxembourg	00.800.1777.9999
Malaysia	00.800.1777.9999
Mexico	001.866.376.0139
Netherlands	00.800.1777.9999
New Zealand	0800.002341
Nicaragua	011.800.222.5602
Nigeria	070.80601844
Norway	00.800.1777.9999
Panama	001.800.204.9188
Philippines	00.800.1777.9999
Poland	00.800.141.0213
Portugal	00.800.1777.9999
Russia	8.800.100.9615
Saudi Arabia	+966.811.1072514
Singapore	800.852.3912
South Africa	+27.105004106
Spain	00.800.1777.9999
Sri Lanka (inside Colombo)	247.2494

COUNTRY	TOLL-FREE NUMBER
Sri Lanka (outside Colombo)	011.247.2494
Sweden	00.800.1777.9999
Switzerland (includes Liechtenstein)	00.800.1777.9999
Taiwan	00.800.1777.9999
Thailand	011.800.1777.9999
Turkey	00.800.113.0803
Ukraine	0.800.501134
United Arab Emirates	8000.3570.3169
United Kingdom (includes England, Scotland, Northern Ireland, Wales)	00.800.1777.9999
United States and Canada (includes U.S. Virgin Islands, Puerto Rico, Guam)	1.800.461.9330
Venezuela	0800.102.9423
Venezuela (Caracas)	+58.212.7820.2174
Vietnam	122.80.390
Zimbabwe	+263.86.4404.1046

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